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June 11, 2019

BY MAIL AND ECF

The Honorable Vincent L. Briccetti
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

**Re: United States v. Jamal Bryant
18 Cr. 503(VB)**

Dear Judge Briccetti:

This letter is written on behalf of Mr. Jamal Bryant who is currently scheduled for sentencing before this Court on Thursday, June 13, 2019 at 3:00 p.m. Mr. Bryant was initially arrested and charged in an Indictment with a drug conspiracy in violation of Title 21 U.S.C. §846. His initial appearance was on July 20, 2018, and he has been detained since that time. On March 15, 2019, he pleaded guilty to a Two-Count Indictment. Count One charges a narcotics conspiracy in violation of Title 21 U.S.C. §841(b)(1)(C), and Count Two is a forfeiture Count.

The plea was entered pursuant to a Plea Agreement, ("Agreement.") The Agreement calculates the Guidelines at an adjusted offense level of 15, a CHC of V for a sentencing range of 37-46 months. The majority of his criminal history points are a result of prior drug convictions. Mr. Bryant respectfully requests that this Court sentence him to 24 months of incarceration, supervised release with the special condition of mental health and drug counseling.

Mr. Bryant is a 41-year-old drug addict. For the past 25 years he has self medicated with everything from marijuana to PCP, cocaine, Ecstasy and finally heroin. It is this addiction which brings him before this Court. Like many young men who grow up in less than stable environments the streets became his home and the drugs became his escape. He is before this Court because he was selling drugs to support his habit. There is no question that he needs extended drug treatment. To date he has had a number of out patient programs which have failed to alter his behavior. There is no doubt that he needs intensive drug treatment.

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We have received and reviewed the Presentence Investigation Report. ("PSR.") The Guideline calculations are in conformity with the Agreement. Probation recommends a sentence of 46 months, the top of the Guideline range, noting, "... [t]he instant offense represents the defendant's 13th known conviction. Bryant's convictions are mostly drug-related." (PSR page 20.) This is certainly not surprising given his decades of drug use. (PSR page 13, ¶¶60-68.) Yet probation fails to recognize that drug addiction is a disease and until the disease is under control, there is no anecdote for the criminal behavior. Indeed, Mr. Brant caught a drug charge while incarcerated. (PSR page 7, ¶ 33.) Drugs are all over our "correctional" facilities. Mr. Bryant is also a poet and his poems show extraordinary insight into who Mr. Bryant is as well as his self realization of his dilemma. Each of these poems, which he recites in a rap, are insightful and well reasoned. They exhibit the potential of what he could be and what he hopes to become, if he could just get and stay sober. From his poem, "Wise Mind" he states, "Mind clear as spring water when clean and when sober it's never too late to move forward, even if you have to start over." Exhibit A.

His family and friends have also submitted letters for this Court's consideration. They all speak of a kind and loving young man. (Exhibit B.) One wonders where these people were when Mr. Bryant was living on the streets and using drugs. In any event they all seem to love and respect him and are here for him now. The final letter is from Mr. Bryant. His realization of what he has lost and what he has missed is heartfelt and deeply moving. " Unfortunately I am going to miss my eldest daughter's graduation as well as her transition to college." He goes on to state " I recognize my negative influence I've caused in the community while involved in drugs. I wouldn't want nobody selling it to my baby" Exhibit C.

What is obvious from his history is that when his mom moved out of state and then died he became homeless, drifted around and ended up on the streets. Mr. Bryant is the father of three daughters. Jahliah Bryant, is 18 years old and lives with her mom in Connecticut. She is graduating from high school this year. This is the daughter he refers to when he speaks of missing her graduation. His middle child, Amani is 11 years old and lives with her mother in Georgia. His youngest daughter is 3 years old and lives with her mother in Connecticut.

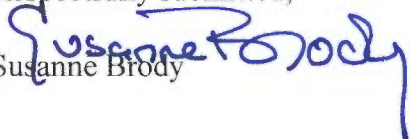
Mr. Bryant is a bright and articulate young man. If he can become sober, he will have a bright future. Unfortunately, it is not an easy battle and he respectfully requests that this Court mandate both drug and mental health counseling as special conditions of his supervised release. We respectfully request that this Court sentence Mr. Bryant to 24 months of incarceration with supervised release. To sentence him to additional time is to punish the disease, and will not help to cure the problem.

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Respectfully submitted,


Susanne Brody

cc: Mr. Jamal Bryant

Celia V. Cohen, A.U.S.A.

Christopher J. Clore, A.U.S.A.

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